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July 5, 2023

BY ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Pearl Street, New York, NY 10007

Re: *Vasquez v. New York City Department of Education* 22-CV-3360 (PAC)

Dear Judge Crotty:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel, and the attorney assigned to represent the Defendant in the above referenced matter, wherein Plaintiff brings suit for monetary damages stemming from alleged disability discrimination. I write to respectfully request a three-week extension of Defendant's time to file a Motion to Dismiss, from July 7, 2023 until July 28, 2023.

The reason for the request is that I recently suffered a fracture in my knee, which requires multiple doctor's appointments and which necessitates me to cease from walking until it is healed. As such, my ability to meet my work demands has been hindered, and the requested extension will allow me to finish drafting the motion papers.

This is Defendant's first request for an extension of time to file the Motion to Dismiss. Plaintiff's counsel, Shaya Berger, Esq., consents to this request. If the requested extension is granted, the Parties propose the following briefing schedule:

- July 28, 2023: Defendant's Motion to Dismiss;
- August 28, 2023: Plaintiff's Opposition to Defendant's Motion to Dismiss;
- September 18, 2023: Defendant's Reply, if any.

Thank you for your consideration of this request.

7/6/2023

The proposed extensions on the briefing schedule is adopted. SO ORDERED.



Respectfully submitted,

/s/ Jay Cullen

Jay Cullen
Assistant Corporation Counsel

cc: **by ECF**
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